

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NATIA KENYCE TAYLOR,

Case No.: 1:24 CV-07369

Plaintiff,

**COMPLAINT**

-against-

UNITED STATES OF AMERICA,

Defendant.

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Plaintiff, NATIA KENYCE TAYLOR (referred to as "Plaintiff"), by her attorneys, **LAW OFFICE OF DANIEL LEVY, LLP** for her complaint against defendant, UNITED STATES OF AMERICA (hereinafter referred to as "DEFENDANT") respectfully allege as follows:

**THE PARTIES**

1. During all relevant times hereto, Plaintiff was a resident of the State of New York NY with a primary residence at 100 Casals Place, Unit 33B, Bronx, NY 10475.

2. The UNITED STATES OF AMERICA is a named defendant in this action pursuant to Federal Tort Claim Act, 28 U.S.C. Section 2671, et seq.

3. This court has exclusive jurisdiction over this matter pursuant to 28 U.S.C. Section 1346(b)(1).

4. Venue is proper in The Southern District of New York,

pursuant to 28 U.S.C. Section 1402(b), as Plaintiff resides in the instant district, and the act which is the subject of the instant action occurred in the Southern District of New York.

**CLAIM NUMBER 1**

5. Plaintiff, NATIA TAYLOR, hereby sues Defendant, UNITED STATES OF AMERICA, and reaffirms and realleges herein paragraphs one through four, inclusive as if fully set forth herein.

6. On January 24, 2023, Plaintiff was the owner/operator of a Jeep (hereinafter referred to as "Vehicle 1") bearing New York license plate number "HTC5008".

7. During all relevant times hereto, ANTONIO BERESFORD WORLEY MINOTT, ("ANTONIO") was an agent or employee of the UNITED STATES POSTAL SERVICE ("USPS"), and agency of the Defendant, UNITED STATES OF AMERICA.

8. On January 24, 2023, defendant, UNITED STATES OF AMERICA owned a Peterbilt (hereinafter referred to herein as Vehicle "2") bearing license plate number "00000"

9. On January 24, 2023, ANTONIO operated Vehicle "2" as an agent or employee of the USPS, and agency of the Defendant, UNITED STATES OF AMERICA.

10. On January 24, 2023, Plaintiff was the driver of Vehicle 1, in the State of New York, County of Bronx on the public roadway

therein known as S/B New England Thruway at or near the Hutchinson Parkway, Bronx, NY (hereinafter referred to as the "Location").

11. During all relevant times hereto, the Location was and remains a public roadway.

12. On January 24, 2023, ANTONIO, an employee or agent of USPS, an agency of Defendant, UNITED STATES OF AMERICA operated Vehicle 2 at the Location.

13. On January 24, 2023, Vehicle 1 and Vehicle 2 came into contact with one another at the Location (hereinafter referred to as the "Collision") when Vehicle 2 struck Vehicle 1 from behind.

14. As a direct result of the Collision, Plaintiff sustained serious, severe, permanent and lasting injuries as hereinafter further alleged.

15. The Collision and the injuries sustained by Plaintiff was caused solely by the negligence of the Defendant.

16. Plaintiff delivered to the USPS, the appropriate agency of the Defendant, her "Claim for Damages, Injury or Death" Standard Form 95, pursuant to 28 U.S.C. Sections 1346 and 2675; and 28 U.S.C. 2671 et seq. A copy of said Claim was received by the USPS on March 27, 2023.

17. Plaintiff has otherwise complied with the notice requirements and condition precedent to the instant action against

Defendant.

**WHEREFORE**, Plaintiff demands judgment against the Defendant on all causes of action for compensatory damages, plus cost, and demands a trial of all issues contained herein for such other and further relief as this court deems just and proper.

Dated: Bronx, New York  
September 30, 2024

Yours, etc.,



Shane Rios

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